

53rd at Third
885 Third Avenue
New York, New York 10022-4834
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

LATHAM & WATKINS LLP

November 15, 2018

VIA ECF

Hon. Judith C. McCarthy
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

FIRM / AFFILIATE OFFICES

Beijing	Moscow
Boston	Munich
Brussels	New York
Century City	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	Rome
Frankfurt	San Diego
Hamburg	San Francisco
Hong Kong	Seoul
Houston	Shanghai
London	Silicon Valley
Los Angeles	Singapore
Madrid	Tokyo
Milan	Washington, D.C.

Re: *National Association for the Advancement of Colored People, Spring Valley Branch v. East Ramapo Central School District, No. 17 Civ. 8943*

Dear Judge McCarthy:

We write on behalf of Plaintiffs in the above referenced action to respectfully request the Court's authorization to file documents under seal in connection with Plaintiffs' response to Defendant's letter motion regarding an anticipated motion to quash the subpoenas directed to Mr. David Butler.

Plaintiffs request that Exhibits 1, 2, and 3 to the response be filed under seal. The documents, which consist of two WhatsApp chats and one text message exchange, were produced by the District in this action and were all designated as "confidential" pursuant to the Parties' Stipulated Protective Order, dated February 6, 2018, Dkt. No. 64 (the "Protective Order").

Plaintiffs do not believe these documents contain information that "adversely affect[s] the [District's] privacy obligations or personal interests" (Protective Order, "Definitions") but respectfully request that these exhibits be filed under seal because of the District's confidentiality designations. Moreover, Plaintiffs reserve all rights to challenge these designations of confidentiality at a later time. We appreciate Your Honor's consideration in this matter.

Respectfully submitted,

/s/ Claudia T. Salomon
Claudia T. Salomon

cc: All Counsel of Record via ECF